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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

NXIVM CORPORATION, formerly known as EXECUTIVE SUCCESS PROGRAMS, INC. and FIRST PRINCIPLES, INC.,	:	
Plaintiffs,	:	Civil Action No. 2:06-cv-01051 (KSH/CLW)
- against -	:	
MORRIS SUTTON, ROCHELLE SUTTON, THE ROSS INSTITUTE, RICK ROSS a/k/a "RICKY" ROSS, STEPHANIE FRANCO, PAUL MARTIN, Ph.D., and WELLSPRING RETREAT, INC.,	:	Hon. Katharine S. Hayden, U.S.D.J. Hon. Cathy L. Waldor, U.S.M.J.
Defendants.	:	Motion Day: <u>November 7, 2022</u>
RICK ROSS,	x	<b>NOTICE OF MOTION FOR TURNOVER OF FUNDS</b>
Counterclaim Plaintiff,	:	<i>(Interfor, Inc. v. NXIVM Corp.)</i>
- against -	:	
KEITH RANIERE, NANCY SALZMAN, KRISTIN KEEFFE, INTERFOR, INC., JUVAL AVIV, JANE DOE and JOHN DOES 1-10,	:	
Counterclaim Defendants.	:	
INTERFOR, INC. and JUVAL AVIV,	x	
Crossclaimants,	:	
- against -	:	
NXIVM CORPORATION, KEITH RANIERE, NANCY SALZMAN and KRISTIN KEEFFE,	:	
Crossclaim Defendants.	:	

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**PLEASE TAKE NOTICE** that on November 7, 2022, or as soon thereafter as counsel may be heard, the undersigned counsel for crossclaim plaintiff Interfor, Inc. ("Interfor") shall move before this Court, at the United States Courthouse and Federal Building, 50 Walnut Street, Newark, New Jersey 17102, for entry of an Order for the Turnover of Funds.

**PLEASE TAKE FURTHER NOTICE** that, in support of this motion, Interfor shall rely solely upon this Notice of Motion and the Certification of Andrew M. Englander, together with Exhibits, submitted herewith. As there are no novel issues of law before this Court, no brief is required.

**PLEASE TAKE FURTHER NOTICE** that a form of Order has been submitted herewith pursuant to the Rules of this Court.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Rule 7.1, this motion may be deemed uncontested and the proposed form of Order may be signed by the Court unless responsive papers are timely filed and served in opposition to the relief sought.

Dated: Newark, New Jersey  
October 11, 2022

FRIEDMAN KAPLAN SEILER &  
ADELMAN LLP

s/ Andrew M. Englander

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